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Certified Mail Receipt # 3089

September 4, 2015

Ms. Kathleen Tarbuck, P.E.
Maine Department of Environmental Protection
Bureau of Air Quality
17 State House Station
Augusta, Maine 04333

Re: Dragon Products Company, LLC
Quarterly Update for Hydrogen Chloride Compliance Extension

Dear Ms. Tarbuck:

Dragon Products Company, LLC (Dragon) is providing the Maine Department of Environmental Protection (Department) supplemental information regarding the commercial availability of National Institute of Standards and Technology (NIST) traceable, low concentration, calibration gases for the operation of Dragon's hydrogen chloride (HCl) continuous emission monitoring system (CEMS). This submittal is pursuant to the one-year compliance extension for HCl emission limits granted by the Department to Dragon on June 9, 2015.

On May 12, 2015 Dragon requested a one-year compliance date extension of the portland cement hydrogen chloride (HCl) emission limit under 40 CFR §63 Subpart LLL due to the lack of commercially available NIST traceable low range calibration gases. NIST traceable gases are required to confirm CEMS are accurately monitoring emissions through performance audits and daily quality assurance procedures required under the performance testing and quality assurance policies developed by the U.S. Environmental Protection Agency (EPA).

Dragon's May 12, 2015 extension request stated, "The procedures for certification of the calibration gases are prescribed in "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards" EPA/600/R-12/531, May 2012. EPA has stated that the NIST has certified Research Gas Mixtures (RGMs) for only one gas supplier. The reference document states that standard reference materials (SRMs) and NIST Traceable Reference Materials (NTRMS) are not available for HCl. The gas supplier is to use the RGMs to create Gas Manufacturer Intermediate Standards which are then used to produce calibration gases for the sale to CEMS users in order to conduct the required CEMS accuracy audits."

Recently Dragon contacted the lead project manager for the HCl gas project with NIST, Ms. Lacey Brent, regarding the availability of NIST traceable HCl calibration gases. Ms. Brent informed Dragon that, "NIST is currently not making any plans to produce HCl Standard Reference Materials (SRMs). NIST is in the process of developing a method to

ratio HCl in N₂ gas mixtures against the SRM 3182, Chloride Anion in standard solution using ion chromatography. This method will be used to certify commercially available HCl in nitrogen. NIST will certify the Research Gas Materials (RGMs) prepared by gas producing companies.”

In addition, Dragon directly communicated with Mr. Jeff Ryan, senior scientist with EPA’s Office of Research and Development regarding this matter. Mr. Ryan informed Dragon that, “It is important to point out that NIST traceability is defined by EPA. There are EPA guidance documents that are used by the commercial gas industry to establish and provide these gases. Where we stand is that the range of available HCl gas concentration ranges needs to be expanded (and the number of commercial gas vendors offering these gases). That is what I am working on with NIST and the gas industry – to facilitate the infrastructure to meet this capability.”

At this time neither NIST nor the EPA could offer a timeframe for when a certifiable method for HCl gas creation will be complete. Mr. Ryan of the EPA noted that a meeting was scheduled in August 2015 for members of NIST, EPA, and commercial gas vendors to discuss the HCl calibration gas project. He did not confirm that meeting was held.

In conclusion, Dragon maintains the need for a compliance extension for HCl emission limits for a minimum of one-year. Dragon will continue to interface with members of NIST, the EPA, and commercial gas vendors and update the Department on a quarterly basis.

If you have any questions regarding Dragon’s request please contact me at (207) 593-0147.

Sincerely,



Michael W. Martunas
Environmental Compliance Manager
Dragon Products Company, LLC

c.c Ms. Susan Lancey (EPA Region 1)
 Mr. Stephen P. Holt, P.E. (Dragon)